

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HAROLD FORD,

Plaintiff,

-against-

WSP USA INC.,

Defendant.

19 Civ. 11705 (LGS)

**NOTICE OF MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant WSP USA Inc.'s Motion for Partial Summary Judgment pursuant to Federal Rule of Civil Procedure 56 and Local Civil Rule 56.1; the Declaration of Gregory Knopp sworn to on March 26, 2021, including all attachments thereto; the Declaration of Patricia Brush sworn to on March 26, 2021, including the attachment thereto; the Declaration of Perry Dobbs sworn to on March 26, 2021, including all attachments thereto; the Statement of Undisputed Facts; and all prior pleadings and proceedings herein, the undersigned attorneys for Defendant WSP USA Inc. will move this Court at such time as the Court designates, before the Honorable Lorna J. Schofield, at the Thurgood Marshall United States Courthouse located at 40 Foley Square, New York, New York 10007 for an Order Granting Defendant's Motion for Summary Judgment with respect to the claim alleging a willful violation of the Fair Labor Standards Act in Plaintiff Harold Ford's Complaint.

Dated: March 26, 2021

Respectfully submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

s/ Gregory W. Knopp

Gregory W. Knopp

New York Bar No. 2892909

1999 Avenue of the Stars, Suite 600

Los Angeles, CA 90067

Telephone: 310.229.1000

Facsimile: 310.229.1001

gknopp@akingump.com

Nathan J. Oleson (*pro hac vice*)

Joshua K. Sekoski (*pro hac vice*)

Zara H. Shore (*pro hac vice*)

2006 K Street, NW

Washington, DC 20006

Telephone: 202.887.4000

Facsimile: 202.887.4288

noleson@akingump.com

jsekoski@akingump.com

zshore@akingump.com

*Counsel for Defendant WSP USA Inc.*